

REMARKS

Claims 1-85 are pending in the present application. However, claims 31-40, 51-54, 56-74, and 76-85 have been withdrawn from consideration in response to a restriction requirement imposed by the Examiner.

In the Office Action, claims 1-5, 9-22, 30, and 41-50 were rejected under 35 U.S.C. § 102(e) as allegedly being anticipated by Lindsay (U.S. Patent Application Publication No. 2002/0194415). Claims 6 and 23 were rejected under 35 U.S.C. § 103(a) as allegedly being obvious over Lindsay in view of what was allegedly well-known in the art. Claims 7-8 and 24-26 were rejected under 35 U.S.C. § 103(a) as allegedly being obvious over Lindsay in view of the admitted prior art. Claims 27-29 were rejected under 35 U.S.C. § 103(a) as allegedly being obvious over Lindsay in view of Deschapper (U.S. Patent No. 6,199,134). Claims 55 and 75 were rejected under 35 U.S.C. § 103(a) as allegedly being obvious over Lindsay, the admitted prior art, and Deschapper. The Examiner's rejections are respectfully traversed.

Lindsay describes a controller 700 that is adapted to accommodate at least one protocol intended to effect management functionality. Aspects of such management functionality can be defined by the Alert Standard Format (ASF) specification protocol, the Advanced Configuration and Power Interface Specification protocol (ACPI), and other protocols. See Lindsay [0074-0075]. Lindsay also describes an alerting network controller that can be similar in functionality to controller 825, which is an alert supervisory bus controller that operates according to the Alert Standard Format. See Lindsay paragraphs [0083, 0086]. Lindsay also describes an ASF Configuration Application 922 that may retrieve data represented in an ASF Table via an Advanced Configuration and Power Interface (ACPI) mechanism. See Lindsay, paragraph [0096].

The Examiner then alleges that the components of controllers 700 and 825 operate according to the ACPI protocol and that the configuration application 922 uses the ACPI protocol for configuration. Although the controllers 700, 825 and the configuration application 922 may operate in accordance with the ACPI protocol, Applicants respectfully submit that none of these entities act as an ACPI controller. Applicants respectfully submit that persons of ordinary skill in the art will appreciate that an ACPI controller is a controller that is configured to implement various mechanisms defined by the ACPI protocol. The mechanisms defined by the ACPI protocol may be accessed or utilized by other entities within the computer system to perform operations in accordance with the ACPI protocol. For example, as described in Lindsay, the ASF Configuration Application 922 may retrieve data represented in an ASF Table via an ACPI mechanism. See Lindsay, paragraph [0096].

Accordingly, Applicant respectfully submits that Lindsay fails to teach or suggest a microcontroller that is configured as either an Alert Standard Format master or slave and is further configured as an Advanced Configuration and Power Interface (ACPI) controller, as set forth in independent claims 1, 9, and 41. Applicant therefore submits that independent claims 1, 9, 41, and all claims depending therefrom, are not anticipated by Lindsay and requests that the Examiner's rejections of claims 1-5, 9-22, 30, and 41-50 under 35 U.S.C. § 102(e) be withdrawn.

Moreover, it is respectfully submitted that the pending claims are not obvious in view of the cited references, either alone or in combination. To establish a *prima facie* case of obviousness, the prior art reference (or references when combined) must teach or suggest all the claim limitations. *In re Royka*, 490 F.2d 981, 180 U.S.P.Q. 580 (CCPA 1974). As discussed above, Lindsay fails to teach or suggest a microcontroller that is configured as either an Alert

Standard Format master or slave and is further configured as an Advanced Configuration and Power Interface (ACPI) controller, as set forth in independent claims 1, 9, and 41.

The Examiner takes Official Notice that embedded 8051 microcontrollers are well-known in the art, relies upon the background section of the present application to teach a microcontroller in a south bridge, and relies upon Deschepper to describe ACPI controller interfaces. However, none of these secondary references remedy the fundamental deficiencies in the primary reference. Consequently, Applicant respectfully submits that the prior art of record fails to teach or suggest all the limitations of the claimed invention.

For at least the aforementioned reasons, Applicant respectfully submit that the Examiner has failed to make a *prima facie* case that the present invention is obvious over the prior art of record. Applicant requests that the Examiner's rejections of claims 6-8 and 23-29 under 35 U.S.C. § 103(a) be withdrawn.

With regard to the Examiner's rejections of claims 55 and 75 under 35 U.S.C. § 103(a) as allegedly being obvious over Lindsay, the admitted prior art, and Deschapper, Lindsay fails to teach or suggest a microcontroller that is configured as either an Alert Standard Format master or slave and is further configured as an Advanced Configuration and Power Interface (ACPI) controller, as discussed above. Consequently, Applicant respectfully submits that Lindsay fails to teach or suggest receiving an Alert Standard Format message at a microcontroller in the Alert Standard Format south bridge and receiving an ACPI event notification at the microcontroller in the Alert Standard Format south bridge, as set forth in independent claims 55 and 75.

The Examiner relies upon the background section of the present application to teach a microcontroller in a south bridge and Deschepper to describe ACPI controller interfaces. However, none of these secondary references remedy the fundamental deficiencies in the

primary reference. Consequently, Applicant respectfully submits that the prior art of record fails to teach or suggest all the limitations of the claimed invention.

For at least the aforementioned reasons, Applicant respectfully submit that the Examiner has failed to make a *prima facie* case that the present invention is obvious over the prior art of record. Applicant requests that the Examiner's rejections of claims 55 and 75 under 35 U.S.C. § 103(a) be withdrawn.

For the aforementioned reasons, it is respectfully submitted that all claims pending in the present application are in condition for allowance. The Examiner is invited to contact the undersigned at (713) 934-4052 with any questions, comments or suggestions relating to the referenced patent application.

Respectfully submitted,

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